

Amendments to the Drawings:

The attached sheets of drawings include changes to Fig.s 2, 5F, 5G, 6B, 6C, 6D, 9A, 9B, 11A, and 12. These sheets replace the original sheets including Fig.s 2, 5E, 5F, 5G, 5H, 6B, 6C, 6D, 9A, 9B, 9F, 9G, 11A, and 12.

In Fig.2, reference number 20 is changed to 21 (twice).

In Fig.5F, reference number 36 (right occurrence) is changed to 136, and reference number 37 is changed to 137.

In Fig.5G, reference number 36 is changed to 136.

In Fig.6B, reference number 33 is changed to 133, 28 to 128, and 29 to 129 (twice).

In. Fig.s 6C&6D, reference number 34 is changed to 99, 35 to 98 , and 31 to 151.

In Fig.9A, reference number 20 is changed to 21 (twice).

In Fig.9B, reference number 10 is changed to 20, and 20 to 21.

In Fig.11A, reference number 20 is changed to 121.

In Fig.12, reference number 12 is changed to 121.

Attachment: Replacement sheets

Remarks

In the office action of September 27, 2004, objections are made to informalities in the specification and the drawings, claims 1-12 are stated to be allowable, and claims 13-20 are rejected under Sections 102 and 103. The applicant appreciates the detailed corrections and individualized discussion of the rejected claims in the office action. The applicant has amended the specification and drawings as requested by the examiner. Accordingly, only the rejections of claims 13-20 remain for discussion.

Claims 13 and 16 are rejected as anticipated under Section 102(b) by Armentrout, U.S. Patent No. 2, 950,126. Claim 13 has been amended in this response to include the minipallet limitation of claim 17, and claim 17 has been cancelled. Accordingly, amended claim 13 will be discussed in light of the rejection set forth in the office action for claim 17. Claim 17 was rejected as obvious over Armentrout in view of Poth, U.S. Patent No. 6,099,220. Poth was stated to disclose a loaded vehicle with carts containing minipallets. The applicant has carefully reviewed the Poth reference, and noted a reference to the common use of pallets resting on a vehicle floor where they can be handled by a lift truck (Col. 1, lines 22-25). The carts 14 of Poth have several horizontal bars that might be mistaken for stacked pallets, however, based upon the description at col. 3, lines 24-26, it appears that these horizontal bars are simply structural elements of carts 14. The specification states that the van is used to convey carts 14 upon which parts, bins and the like constitute the load. Furthermore, at col. 1, lines 25-31, it appears that Poth is directed to the problem of placing cargo in wheeled carts, so that the entire cart may be removed from the cargo vehicle. Accordingly, the applicant respectfully submits that Poth does not teach the use of minipallets on carts, and therefore traverses the rejection. As amended, the

applicant submits that claim 13 and dependent claims 14-16 and 18-20 are now properly allowable.

Claim 14 is rejected as obvious over Armentrout in view of Bates, U.S. Patent No. 3,984,117. Claim 14 depends from claim 13, which as amended the applicant now believes to be allowable.

Claim 15 is rejected as obvious over Armentrout in view of Clarke, U.S. Patent No. 4,094,526. Claim 15 depends from claim 13, which as amended the applicant now believes to be allowable.

Claim 18 is rejected as obvious over Armentrout in view of Mortenson, U.S. Patent No. 4,078,676. Claim 18 depends from claim 13, which as amended the applicant now believes to be allowable. This rejection is discussed below in connection with newly proposed claim 21.

Claims 19 and 20 are rejected as obvious over Armentrout in view of Krawczyk, et al. (U.S. Patent No.s 6,299,184; 6,520,515 and Application No.s 09/910,235; 10/673,855; and 10/675,196). Claims 19 and 20 depend from claim 13, which as amended the applicant now believes to be allowable.

Claim 21 is newly proposed and substantially represents claim 13 amended to include the lift gate limitation of claim 18. While Mortenson certainly discloses a lift gate on a truck, there is no suggestion in Mortenson to use such a lift gate on a truck designed to carry carts that engage with the sidewalls. There are no restraining tracks shown on the sidewalls of the truck in Mortenson. None of the cart loaded trucks suggests the use of a lift gate. Indeed, Poth shows the truck backed up flush to the loading dock so that carts can roll directly into the cargo area. Clarke contemplates rolling an entire cart off of the truck, and does not discuss using a lift gate. The applicant submits that without the intention of delivering relatively heavy minipallets of

product on a route, nothing in the references suggests the combination of locking carts and a lift gate. It is only when it is disclosed that the goal is to use a hand truck to remove stacks of product, which will be relatively heavy stacks of product if they are beverages, that the use of a lift gate becomes apparent. The applicant submits that the selection of the Mortenson reference is only made with hindsight, and that in fact there is no suggestion in the art to combine the Armentrout and Mortenson references. Accordingly, the applicant also submits that newly proposed claim 21 is properly allowable.

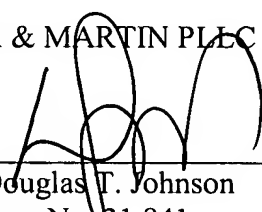
A petition for extension of the third month is enclosed together with the requisite fee of \$1020.00.

The foregoing is submitted as a full and complete response to the office action mailed September 27, 2004 and is believed to have placed claims 1 – 16 and 18-21 in proper form for allowance and such favorable action is requested.

Respectfully submitted,

MILLER & MARTIN PLLC

By: _____


Douglas T. Johnson
Reg. No. 31,841
1000 Volunteer Building
832 Georgia Avenue
Chattanooga, Tennessee 37402-2289
(423) 756-6600